

2023 NOV -2 AM 10: 33

ne indicate di

October 31, 2023

Via: Overnight Mail and email

Yellow Corporation, et al., ¹
Attn: General Counsel
11500 Outlook Street, Suite 400
Overland Park KS 66211

Re: YELLOW CORPORATION, et al., 1 v Debtors.

Chapter 11

Case No. 23-11069 (CTG)

Non-Rolling Stock Asset Cure Objection

United States Bankruptcy Court for the District of Delaware and Yellow Corp.:

Richardsons Properties LLC, by submission of this letter, hereby objects to the United States
Bankruptcy Court's for the District of Delaware ("Court") September 15, 2023, Non-Rolling Stock Asset
Cure Order. Specifically, the involvement of the lease of 101 Lexington Avenue, Suite 4 Cheyenne, WY
82007 between Yellow Corp., Lessee, and Richardsons Properties LLC., Lessor in the aforesaid order.

Yellow Corp. violated the above referenced lease by both failure to pay rent and by filing for bankruptcy. Both of these violations still exist as of the date of this letter.

Richardsons Properties LLC respectfully requests that the "cure" to the above listed violations is the immediate termination of the lease agreement between the parties and the removal of all Yellow Corp. assets still located on or in the premises stipulated in the lease agreement by November 9, 2023. Further, Richardsons Properties LLC requests this "cure" as the lease agreement does NOT extend the right to Yellow Corp to sell this lease agreement or allow the assumption of this lease agreement by a 3rd party.

In exchange for the above "cure" Richardsons Properties LLC will: "forgive" rent owed to Richardson Properties LLC of \$3,450.00; "forgive" any further rent that may become due and payable under said lease after that owed on October 31, 2023; "forgive" the cost of damages to the premises listed in said lease agreement caused by Yellow Corp. Cost of damages has yet to be determined but can be supplied to the Court and Debtor's General Counsel if/when requested.



Please direct responses to this Letter to:

Randall Richardson, President, Richardsons Properties, LLC (<a href="mailto:rand/or.grand/or.

Thomas Cotter, Controller, Richardson's Properties LLC. 1

101 Ledington Avenue, #2

Cheyenne WY \$2007

Sincerely,

Randy Richarson

cc: US Bankruptcy Court District of Delaware

Case #23-11069 (CTG) 824 Market St N. 3rd Floor Wilmington, DE 19801

Kirkland & Ellis LLP

Attn: Allyson B. Smith & Aaron Metviner

601 Lexington Avenue New York, NY 10022

Allyson.smith@kirkland.com

Aaron.metviner@kirkland.com

The Office of the United States Trustee

for the District of Delaware

Attn: Jane Leamy

844 King Street, Suite 2207, Lock Box 35

Wilmington DE 19801

Jane.m.leamy@usdoj.gov

Counsel to the Junior DIP Lender – Quinn Emmanuel Urguhart & Sullivan

Attn: Eric Winston

865 S. Figueroa St., 10th Floor

Los Angeles, CA 90017

Ericwinston@quinnemanuel.com

Counsel to the Debtors - Kirkland & Ellis LLP

Attn: Whitney Fogelberg

300 North La Salle

Chicago, IL 60654

Whitney.fogelberg@kirkland.com

Pachulski Stang Ziehl & Jones LLP

Attn: Laura Davis Jones, Timothy P. Cairns,

Peter J. Keane

919 North Market Street 17th Floor

PO Box 8705

Wilmington, DE 19801

ljones@pszjlaw.com, tcairns@pszjlaw.com,

pkeane@pszjlaw.com

Creditors' Committee Counsel -

Akin Gump Strauss Hauer & Feld LLP

Attn: Philip C. Dublin, Meredith > Lahaie,

Stephen B. Kuhn, Kevin Zuzolol

One Bryant Park, Bank of America Tower

New York, NY 10036-6745

pdublin@akingump.com,

mlahaie@akingump.com,

Skuhn@akingump.com kzuzolo@akingump.com

Counsel to the Junior DIP Lender -

Quinn Emmanuel Urguhart & Sullivan

Attn: Susheel Kirplani

51 Madison Avenue, 22nd Floor

New York NY 10010

susheelkirpalani@quinnemanuel.com

Richardson Properties, LLC

Ropes & Gray LLP
Attn: Lucas S. Smith
191 North Wacker Drive, 32nd Floor
Chicago, IL 60606
Luke.smith@ropesgray.com

Counsel to the Junior DIP Agent –
Holland & Knight LLLP
Attn: Joshua M. Spencer,
Phillip W. Nelson
50 N. Riverside Plaza, Suite 2700
Chicago IL 60606
Joshua.spencer@hklaw.com,
phillip.nelson@hklaw.com

Counsel to the Prepetition ABL Agent – Choate, Hall & Stewart LLP Attn: Kevin Simard, Hampton Foushee Two International Place Boston MA 02110 ksimard@choate.com, hfoushee@choate.com

Counsel to the Prepetition UST Trance A
Agent –
Hogan Lovells US LLP
Attn: Ronald J. Silverman,
Christopher R. Bryant
390 Madison Avenue

New York NY 10017

Counsel to the Unted States Department of the Treasury – Arnold & Porter Kaye Scholer LLP Attn: Michael Messersmith 70 West Madison Street, Suite 4200 Chicago IL 60602

Michael.messersmith@arnoldporter.com

Ropes & Gray LLP
Attn: Natasha S. Hwangpo
1211 Avenue of the Americas
New York, NY 10036
Natasha.hwangpo@ropesgray.com

Counsel to the B-2 Lenders – White & Case LLP
Attn: Scott Greissman, Elizabeth Feld,
Andrew Zatz
1211 Avenue of the Americas
New York, NY 10036
sgreissman@whitecase.com,
efeld@whitecase.com, azatz@whitecase.com

Counsel to the B-2 Agent – Holland & Knight LLP
Attn: Joshua M. Spencer,
Phillip W. Nelson
50 N. Riverside Plaza, Suite 2700
Chicago IL 60606
Joshua.spencer@hklaw.com,
phillip.nelson@hklaw.com
Counsel to the Prepetition UST Trance B
Agent –
Hogan Lovells US LLP
Attn: Ronald J. Silverman,

390 Madison Avenue New York NY 10017 Ronald.silverman@hoganlovells.com, Chris.bryant@hoganlovells.com

Christopher R. Bryant

Counsel to the Unted States Department of the Treasury –
Arnold & Porter Kaye Scholer LLP
Attn: Benjamin Mintz
250 West 55th Street
New York NY 10019
Benjamin.mintz@arnoldporter.com



Counsel to the Unted States Department of the Treasury –
Arnold & Porter Kaye Scholer LLP
Attn: Rosa Evergreen
601 Massachusetts Avenue N. W.
Washington, DC 20001
rosa.evergreen@arnoldporter.com
file

